

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY CLARK,
[DOB: 05/01/1988]

Defendant.

No. 15-3101-01-CR-S-RK

COUNTS 1-2

18 U.S.C. § 2261A

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNTS 3-11

18 U.S.C. § 13

NMT 1 Year Imprisonment

NMT \$100,000.00 Fine

NMT 1 Year Supervised Release

Class A Misdemeanor

Restitution

\$100 Special Assessment per count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

Between April 1, 2015, and continuing to August 13, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, within the special maritime or territorial jurisdiction of the United States, that being the United States Medical Center for Federal Prisoners Springfield, with the intent to harass another person, K.A., and in the course of and as a result of such harassment, caused substantial emotional distress to K.A. all in violation of Title 18, United States Code, Section 2261A.

COUNT 2

On or about September 21, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, within the special maritime or territorial jurisdiction of the United States, that being the United States Medical Center for Federal Prisoners Springfield, with the intent to harass another person, M.W., and in the course of and as a result of such harassment, caused substantial emotional distress to M.W., all in violation of Title 18, United States Code, Section 2261A.

COUNT 3

On or about January 13, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 4

On or about February 23, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause

affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 5

On or about March 11, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 6

On or about March 17, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 7

On or about March 20, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction

thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 8

On or about April 1, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 9

On or about June 14, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 10

On or about July 18, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

COUNT 11

On or about September 17, 2015, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY CLARK**, at the United States Medical Center for Federal Prisoners Springfield, land acquired for the use of the United States and under the exclusive jurisdiction thereof as defined in Title 18, United States Code, Section 7(3), exposed his genitals, and the defendant did so under circumstances in which he knew that such conduct was likely to cause affront or alarm, in violation of Section 566.093 of the State of Missouri Revised Statutes, all in violation of Title 18, United States Code, Sections 7(3) and 13.

A TRUE BILL

/s/ Linda S. Jordan

FOREPERSON OF THE GRAND JURY

/s/ Ami Harshad Miller

AMI HARSHAD MILLER #57711

Assistant United States Attorney

DATED: 11/03/2015

Springfield, Missouri